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August 15, 2023

Counsel for Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

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In Re:

Case No. 22-50366-hlb
Chapter 7

SCOTT A. CORRIDAN,

CHAPTER 7 TRUSTEE, EDWARD M.
BURR'S LIMITED OBJECTION TO
MOTION OF SAVANNAH SCOVILLE
FOR AN ORDER COMPELLING
DEBTOR'S IMMEDIATE PAYMENT
OF ADMINISTRATIVE EXPENSE
CLAIM

Debtor.

Hearing Date: August 29, 2023
Hearing Time: 2:00 p.m.

Chapter 7 Trustee, Edward M. Burr (the "Trustee"), by and through his counsel,
Holly E. Estes, Esq., of Estes Law, P.C. hereby files his limited objection to the Motion of
Savannah Scoville for an Order Compelling Debtor's Immediate Payment of
Administrative Expense Claim [DE 198] (the "Motion").

The Trustee does not object to the Court entering an order granting Savannah
Scoville a chapter 11 administrative expense in the amount of \$9,740.00 for work she
performed for the Debtor prior to the conversion of the case. The bankruptcy estate
currently has no money. The Trustee is in the process of determining what assets are
available for liquidation, and in some instances is already in the process of seeking to

have those assets liquidated. The Trustee is also still in the process of evaluating claims and expenses, and he does not believe that the chapter 11 administrative expense bar date has passed. Accordingly, the Trustee objects to the Court ordering the payment of Ms. Scoville's administrative expense until future order of the Court. Specifically, the Trustee requests that the Court reserve ordering payment to Ms. Scoville, as he does not currently know what money will be available to pay chapter 11 administrative expenses, or whether Ms. Scoville's expense will be able to be paid in full, pro-rata with others similarly situated, or if there will not be any money to pay her expense at all.

WHEREFORE the Chapter 7 Trustee requests that the Court allow Ms. Scoville's chapter 11 administrative expense in the amount of \$9,740.00, and deny the remainder of her Motion, with payment of her expense to be determined by future order of the Court.

DATED this 15th day of August, 2023.

ESTES LAW, P.C.

By: /s/ Holly E. Estes
HOLLY E. ESTES, ESQ.
Attorney for the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I, Holly E. Estes, Esq., hereby certify that on the 15th day of August, 2023, the foregoing document was served on all parties consenting to electronic service in this case via the Court's CM/ECF system of the Bankruptcy Court.

/s/ Holly E. Estes

HOLLY E. ESTES